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 14 *Attorneys for Plaintiff*  
 15 *Miriam Goldberg*

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 17 UNITED STATES DISTRICT COURT  
 18 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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 20 Miriam Goldberg, ) Case No.: 3:24-cv-4525  
 21 Plaintiff, )  
 22 v. ) **UNILATERAL STIPULATION AND**  
 23 ) **[PROPOSED] ORDER FOR REMOTE**  
 24 ) **HEARING**  
 25 TeachBK, Inc., *et al.*, ) Date: January 27, 2026  
 26 Defendants. ) Time: 10:30 a.m.  
 27 ) Courtroom: Room G, 15th Floor  
 28 ) Judge: Hon. Lisa J. Cisneros  
 \_\_\_\_\_)

21 Plaintiff Miriam Goldberg stipulates as follows:

22 Ms. Goldberg stipulates and requests that the hearing on Plaintiff's Motion for  
 23 Sanctions against Defendant Ilya Kiselev [ECF No. 69] scheduled for January 27, 2026 at  
 24 10:30 a.m. be held remotely. As grounds, Ms. Goldberg states that, on information and belief,  
 25 Mr. Kiselev has departed from the United States and is unable to attend in person. [See *id.* at 1  
 26 n.1]. Ms. Goldberg also advises the Court that Mr. Kiselev has difficulty speaking English and  
 27 may need an interpreter for the hearing, if held.

1 The undersigned has endeavored to obtain permission to file a joint stipulation to this  
2 effect, explaining to Mr. Kiselev that he would otherwise need to appear in person in San  
3 Francisco for the hearing. In response, Mr. Kiselev wrote to the undersigned: "I do not object to  
4 the hearing being held via Zoom. However, I do not authorize you to add my signature or  
5 represent that I have stipulated to any relief."

6 IT IS SO STIPULATED.

7 Dated: January 7, 2026 Respectfully submitted,  
8 SLATER LEGAL PLLC

By:/s/ *James M. Slater*

By: /s/ James M. Slater  
James M. Slater (admitted *pro hac vice*)

*Attorney for Plaintiff Miriam Goldberg*

**CERTIFICATE OF SERVICE**

14 I hereby certify that on January 7, 2026 a true and correct copy of this document will be  
15 served on Defendants Ilya Kiselev and Andrey Burtsev via email, with a copy delivered by  
16 email to Alla Vorobets, for forwarding purposes.

/s/ James M. Slater  
James M. Slater

1 **[PROPOSED] ORDER**  
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3 Pursuant to Plaintiff Miriam Goldberg's unilateral stipulation, the grounds raised  
4 therein, and good cause appearing, the Court ORDERS that the hearing on Plaintiff's Motion  
5 for Sanctions [ECF No. 69] be held remotely via Zoom on January 27, 2026 at 10:30 a.m.  
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7 Dated: \_\_\_\_\_  
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10 HONORABLE LISA J. CISNEROS  
11 UNITED STATES MAGISTRATE JUDGE  
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